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Of Attorneys for Defendant Funtime R.V., Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

DOLORES CATANA CORTEZ,

Plaintiff,

v.

FUNTIME R.V., INC., an Oregon corporation; and **QUIRIO RAYMUNDO ALARCON ELIZONDO**, aka **QUIRIO ALARCON-ELIZONDO**, aka **QUIRIO ALARCON**, an individual,

Defendants.

Case No. 3:15-cv-02366-YY

**STIPULATED NOTICE OF DISMISSAL
WITH PREJUDICE AND WITHOUT
COSTS OR FEES TO ANY PARTY**

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii)

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff and Defendants, by and through their counsel of record, hereby stipulate that this action and

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**STIPULATED NOTICE OF DISMISSAL
WITH PREJUDICE AND WITHOUT COSTS
OR FEES TO ANY PARTY – Page 1**

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all claims and counterclaims herein shall be dismissed with prejudice and without attorney fees or costs to any party.

IT IS SO STIPULATED:

SAFE HARBOR LAW, LLC

By: s/ Alana G. I. Simmons
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Date: July 18, 2016

Of Attorneys for Plaintiff

HOLLANDER LEBENBAUM & GANNICOTT

By: s/ Jovanna L. Patrick
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Date: July 18, 2016

Of Attorneys for Plaintiff

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Date: July 19, 2016

Attorneys for Defendant Funtime R.V.,
Inc.

DUNN CARNEY ALLEN
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Date: July 18, 2016

Attorneys for Defendant Quirio Raymundo
Alarcon Elizondo

Consent of all counsel to esign this stipulation on their behalf was provided via email.

s/ Heather A. Bowman
Heather A. Bowman, OSB No. 073257
Of Attorneys for Defendant Funtime
R.V., Inc.

STIPULATED NOTICE OF DISMISSAL
WITH PREJUDICE AND WITHOUT COSTS
OR FEES TO ANY PARTY – Page 2

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CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing STIPULATED NOTICE OF DISMISSAL WITH PREJUDICE AND WITHOUT COSTS OR FEES TO ANY PARTY on the following attorneys on the date noted below via the following method:

<p>Alana G. I. Simmons Safe Harbor Law, LLC 5400 NE 30th Ave., #106 Portland, OR 97211 Fax: (971) 279-2039 Email: alana@safe-harbor-law.com</p> <p>Jovanna L. Patrick Hollander, Lebenbaum & Gannicott 1500 SW First Ave., Suite 700 Portland, OR 97201 Fax: (503) 222-0659 Email: jovanna@hollanderlaw.com</p> <p><i>Of Attorneys for Plaintiff</i></p>	<p>Allyson S. Krueger Dunn Carney Allen Higgins & Tongue LLP 851 SW Sixth Avenue, Suite 1500 Portland, OR 97204-1357 Fax: (503) 224-6440 Email: akrueger@dunncarney.com</p> <p><i>Of Attorneys for Defendant Quirio Raymundo Alarcon Elizondo, aka Quirio Alarcon-Elizondo, aka Quirio Alarcon</i></p>
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Method: ☐ US Mail, postage prepaid
☐ Facsimile
☐ Hand Delivery
☒ CM/ECF Electronic Service

Dated this 19th day July, 2016.

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